

United States Department of the Interior  
Bureau of Land Management

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Finding of No Significant Impact  
Environmental Assessment  
DOI-BLM-CO-S010-2015-0015 EA

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March, 2016

**Tres Rios Field Office and Canyons of the Ancients Fire  
Management Planning**

**Location:** Tres Rios Field Office and Canyons of the Ancients National Monument

**Applicant/Address:** USDI BLM

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Tres Rios Field Office  
29211 Highway 184  
Dolores, Colorado, 81323  
970-882-7296

Canyons of the Ancients National Monument  
27501 Highway 184  
Dolores, Colorado, 81323  
970-882-5600



**FINDING OF NO SIGNIFICANT IMPACT**  
**Environmental Assessment**  
***DOI-BLM-CO-S010-2015-0015 EA***  
***Tres Rios Field Office and Canyons of the Ancients National Monument Fire***  
***Management Planning***

**INTRODUCTION:**

The Bureau of Land Management (BLM) has conducted an environmental analysis (NEPA Number) for a proposed action to address fire management activities in the Tres Rios Field Office (TRFO) and Canyons of the Ancients National Monument (CANM) in parts or all of Archuleta, Dolores, La Plata, Montezuma, San Juan, San Miguel, and Montrose Counties. The project would allow for naturally ignited unplanned ignitions to be managed to meet resource objectives on 304,450 acres of TRFO, while on the remaining 371,353 acres (part of TRFO and all of CANM), unplanned ignitions would be managed to meet protection objectives under a suppression strategy. The underlying need for the proposal would be met while accomplishing the following objectives:

1. To manage all unplanned ignitions with the highest priority placed on public and firefighter safety during all phases of wildland fire response.
2. To manage naturally ignited unplanned ignitions to achieve a balance of suppression, the protection of life, property, and natural resources, and the management of unplanned ignitions for resource benefit, to regulate fuels, and maintain healthy ecosystems and vegetation conditions in areas where fire had a historic role in the ecosystem.

The 675,804 acre project area identifies 304,450 acres in which unplanned naturally ignited ignitions may be managed for resource objectives (fire emphasis area) as identified in the Tres Rios Field Office Resource Management Plan, 2015. Within the remaining 371,353 acres of the project area unplanned ignitions would be managed to meet protection objectives under a suppression strategy (including parts of TRFO and the entirety of CANM). EA# DOI-BLM-CO-S010-2015-0015 EA is attached. A no action alternative and the proposed action alternatives were analyzed in the EA.

**FINDING OF NO SIGNIFICANT IMPACT:**

Based upon a review of the EA and the supporting documents, I have determined that the project is not a major federal action and will not significantly affect the quality of the human environment, individually or cumulatively with other actions in the general area. No environmental effects meet the definition of significance in context or intensity as defined in 40 CFR 1508.27 and do not exceed those effects described in the Tres Rios Field Office RMP/FEIS. Therefore, an environmental impact statement is not needed.

This finding is based on the context and intensity of the project as described:

**Context:** The project is a site-specific action directly involving up to 304,450 acres of BLM administered land that by itself does not have international, national, regional, or state-wide importance. Within the 304,450 acre fire emphasis area, up to 10,000 acres of naturally ignited

unplanned ignitions may be utilized to meet resource objectives as identified in the Tres Rios Field Office RMP.

**Intensity:** The following discussion is organized around the Ten Significance Criteria described in 40 CFR 1508.27 and incorporated into resources and issues considered (includes supplemental authorities Appendix 1 H-1790-1) and supplemental Instruction Memorandum, Acts, regulations and Executive Orders.

The following have been considered in evaluating intensity for this proposal:

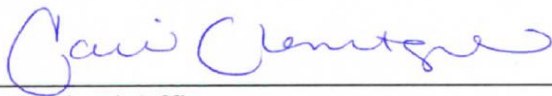
- 1. Impacts may be both beneficial and adverse.** The proposed action would impact resources as described in the EA. Mitigating measures to reduce impacts to Soils and Water Dependent Features, Fire Management, Cultural Resources, Wildlife, Lands/Access, Rangeland Management, Noxious and Invasive (non-native) Weed Species, and BLM Special Status Plant Species were incorporated in the design of the action alternative. None of the environmental effects discussed in detail in the EA and associated appendices are considered significant, nor do the effects exceed those described in the Tres Rios Field Office FEIS.
- 2. The degree to which the selected alternative will affect public health or safety.** The proposed action is designed to allow some naturally ignited unplanned ignitions to be managed for objectives other than full suppression, including to achieve objectives as outlined in the Tres Rios Field Office RMP. Design features of the action alternative prescribe conditions under which these fires would have similar fire effects as those which occurred in the historical context. Design features also identify specific measures to protect sensitive values including those which affect public health and safety.
- 3. Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farm lands, wetlands, wilderness, wild and scenic rivers, or ecologically critical areas.** The following components of the Human Environment and Resource Issues are not affected because they are not present in the project area: Environmental Justice, Farmlands (Prime or Unique), Socio-Economics, and Wild and Scenic Rivers. In addition, the following components of the Human Environment and Resource Issues, although present, would not be affected by this proposed action for the reasons listed in Chapter 1.7 of the EA; Air Quality & Greenhouse Gas Emissions, Recreation, Visual Resources, & Special Status Lands, Lands/Access, and Rangeland Management. Eight components of the Human Environment and Resource Issues were analyzed in detail in Chapter 4. Potential adverse impacts to the historic and cultural resources of the area have been mitigated in the design of the selected alternative. Historic and cultural resources were analyzed in detail in Chapter 4 and would not be significantly impacted due to EA proposed action design features 2.4.2 and 2.4.3. None of these would be significantly impacted because the selected alternative environmental effects will be within the historic range of variability of the presumed historic fire regimes for vegetation types within the project area.
- 4. The degree to which the effects on the quality of the human environment are likely to be highly controversial.** There is no scientific controversy over the nature of the impacts. Naturally ignited unplanned ignitions have been widely used in adjacent land

ownerships to the project area, and also across the nation, to achieve resource objectives as identified within land use plans.

5. **The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.** The project is not unique or unusual. The BLM has experience implementing similar actions in similar areas. The environmental effects to the human environment are fully analyzed in the EA. There are no predicted effects on the human environment that are considered to be highly uncertain or involve unique or unknown risks.
6. **The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.** The actions considered in the selected alternative were considered by the interdisciplinary team within the context of past, present, and reasonably foreseeable future actions. Significant cumulative effects are not predicted. The proposed action does not set a precedent for future actions with similar effects nor does it represent a decision in principle about a future consideration. A complete analysis of the direct, indirect, and cumulative effects of the selected alternative and all other alternatives is described in Chapter 4 of the EA.
7. **Whether the action is related to other actions with individually insignificant but cumulatively significant impacts – which include connected actions regardless of land ownership.** The interdisciplinary team evaluated the possible actions in context of past, present and reasonably foreseeable actions. Significant cumulative effects are not predicted. A complete disclosure of the effects of the project is contained in Chapter 4 of the EA.
8. **The degree to which the action may adversely affect districts, sites, highways, structures, or other objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.** The project will not adversely affect districts, sites, highways, structures, or other objects listed in or eligible for listing in the National Register of Historic Places, nor will it cause loss or destruction of significant scientific, cultural, or historical resources. The proposed action includes design features to ensure National Register listed and eligible cultural resources will not be significantly impacted. The Colorado SHPO was afforded the opportunity to comment on this undertaking in accordance with the provisions of the Colorado BLM SHPO State Protocol Agreement (Section V.). The Colorado SHPO did not provide comment.
9. **The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973, or the degree to which the action may adversely affect: 1) a proposed to be listed endangered or threatened species or its habitat, or 2) a species on BLM's sensitive species list.** Mitigating measures to reduce impacts to wildlife and fisheries have been incorporated into the design of the action alternatives. Although three listed species occupy habitat, and one listed species has critical habitat within the project area, it has been determined that they will not be affected because of design features of the proposed action listed in Chapter 2.4.4 of the EA, or because their habitat occurs outside of the proposed action fire emphasis area. Eleven species of BLM special status

plants occur within the project area, four of which occur in the proposed action emphasis area. Because these plant species are protected through design criteria, this project will have “no effect” on these species or their habitat. No other threatened or endangered plants or animals are known to occur in the area. Section 7 ESA regarding Gunnison Sage-Grouse Unoccupied Critical Habitat is ongoing, and the selected alternative will not proceed in these areas until consultation is completed with the USF&WS concurring with the BLM’s determination.

- 10. Whether the action threatens a violation of a federal, state, local, or tribal law, regulation or policy imposed for the protection of the environment, where non-federal requirements are consistent with federal requirements.** The project does not violate any known federal, state, local or tribal law or requirement imposed for the protection of the environment. State, local, and tribal interests were given the opportunity to participate in the environmental analysis process. The project was scoped at a tribal consultation meeting on September 15, 2015, during which tribes expressed the importance of retaining cultural resources on the landscape, which is analyzed in Chapters 3.6 and 4.2.6 of the EA. Furthermore, letters were sent to 26 Native American tribes concerning consulting party status, and there were three responses from tribes and pueblos. The Hopi Tribe requested a draft EA for comment. One comment letter from the Hopi Tribe was received. Responses to this comment letter are incorporated into Chapter 5.3 of the EA.

  
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Authorized Officer

Connie Clementson, Field Manager

3-28-16  
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Date